

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,	:	Case No. 1:23-cr-00490
	:	
Plaintiff,	:	
	:	
vs.	:	<b>DECLARATION OF TIMOTHY M.</b>
	:	<b>DONOHUE IN SUPPORT OF MOTION</b>
ROBERT MENENDEZ, et al,	:	<b>TO APPEAR PRO HAC VICE</b>
	:	
Defendants.	:	
	:	

TIMOTHY M. DONOHUE declares pursuant to 28 U.S.C. § 1746:

1. I submit this Declaration pursuant to Local Rule 1.3 in support of my motion to appear *pro hac vice* in the above-captioned matter.

2. I am a partner with the law firm of Arleo & Donohue, LLC. My business address is 622 Eagle Rock Avenue, West Orange, NJ, 07502; Tel: (973) 736-8660; Fax: (973) 736-1712. My email address is tim.donohue@arleodonohue.com.

3. I am an attorney at law and a member in good standing of the bar of the State of New Jersey. True and correct copies of my Certificate of Good Standing issued by the bar of the State of New Jersey within the past 30 days is attached hereto at Exhibit A.

4. I have never been convicted of a felony. I have never been censured, suspended, disbarred, or denied admission or readmission by any court. There are no pending disciplinary complaints against me and I have never been the subject of any disciplinary matter.

5. I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 13, 2023

Respectfully submitted,

ARLEO & DONOHUE, LLC.

By: /s/ Timothy M. Donohue

Timothy M. Donohue

622 Eagle Rock Avenue

West Orange, NJ 07052

Tel. (973) 736-8660

[Tim.donohue@arleodonohue.com](mailto:Tim.donohue@arleodonohue.com)

Counsel for Fred Daibes